

N00164.AR.002465
NSA CRANE
5090.3a

U S NAVY RESPONSES TO U S EPA COMMENTS ON TIER II SAMPLING AND ANALYSIS
PLAN FOR SOIL CONTAMINATED DELINEATION FOR CORRECTIVE MEASURES DESIGN
OLD JEEP TRAIL TREATMENT AREA SOLID WASTE MANAGEMENT UNIT 3 (SWMU 3)
AMMUNITION BURNING GROUND/OLD JEEP TRAIL NSA CRANE IN
11/7/2011
U S NAVY

RESPONSES TO EPA COMMENTS RECEIVED NOVEMBER 7, 2011

**TIER II SAP FOR SOIL CONTAMINATION DELINEATION FOR CORRECTIVE MEASURES
DESIGN AT THE OLD JEEP TRAIL TREATMENT AREA OF SWMU 3 – AMMUNITION
BURNING GROUND/OLD JEEP TRAIL**

NSA CRANE

Comment 1: Signature Page needs QA Person Sign Off Block (Allen Debus). Correct Jose Cisneros' title to Remediation and Reuse Branch Chief

Response: A signature line for Allen Debus has been added to the Signature Page. In addition, Mr. Cisneros' title has been changed to "Remediation and Reuse Branch Chief".

Comment 2: The abbreviation "FBL" appears in numerous locations throughout the document but is not defined in the Acronyms and Abbreviations section.

Response: The abbreviation "FBL" stands for Fixed Base Laboratory. The definition has been added to the Acronym List, as well as the first time it is called out in the text (i.e., Worksheet No. 3, 1st paragraph)

Comment 3: Referring to Section 4.3, this planned removal action should be defined as an Interim Measure if we are still working on finalizing the CMP. Add text to provide rationale for the chosen MCS values for lead, RDX and TNT and, with regards to explosives, the need to consider migration to groundwater as a MCS given the existing impacts.

Response: The Corrective Measures Proposal (CMP) report was prepared by Tetra Tech in 2009. The work to be conducted under this SAP has been correctly identified as an Interim Measure in numerous places throughout the SAP. The results of the field activities will be used to aid in developing a Corrective Measures Design for the site.

The fourth paragraph in Section 4.3 has been revised to read:

The MCSs for RDX (55 mg/kg) and TNT (190 mg/kg) are based on 10 times the USEPA Soil Screening Value for the protection of the human health residential receptor. The 10 times MCS value equates to a 1×10^{-5} carcinogenic risk. Explosives were not determined to be a risk concern for groundwater exposure in the RFI Report (Tetra Tech, 2005). In addition, historical data shows a declining trend for explosive concentrations in groundwater; therefore, the removal of explosive contaminated soil, as planned in the remedy, will only further decrease the concentrations of explosives in groundwater.

In addition, the last paragraph in Section 4.3 has been revised to read (added text is bolded):

*"Implementation of this selected remedial alternative for soil is the impetus for this SAP. The data to be collected will be used in conjunction with the existing data to determine the extent of remediation, **which will be addressed in an Interim Measures Work Plan.**"*

Comment 4: Referring to Section 5.1: here, and in any other locations as needed throughout the document, references to selection of remedy should be changed to Interim Measure as no Final Remedy has been selected for ABG at this time.

Response: The work to be conducted under this SAP has been revised to indicate it is to aid in implementing an Interim Measure in Section 5.1, and in numerous other applicable sections throughout the SAP.

Comment 5: Check the SOP references in the first two bullets on page 23. They seem to be incorrect.

Response: For the first bulleted item on page 23, the SOP for Global Positioning System (GPS) has been corrected to SOP-10. For the second bulleted item (depths of soil intervals), the SOP has been corrected to SOP-06.

Comment 6: Referring to 'a' through 'h' on page 33, will this procedure be applied to all sample depths?

Response: Yes. The first sentence of Line item 8 on Page 32 has been revised to read (added text is bolded):

*"8. Conduct a sequential Step-in/Step-out process to refine the location of the contamination boundary equal to a lead XRF concentration less than or equal to 200 mg/kg **for each sample depth interval of interest.**"*

Comment 7: Referring to Section 7.2: here, or in another appropriate section, text should explain what actions will be taken if lead, RDX, or TNT remained undefined in the vertical direction after following the sampling process outlined in this plan.

Response: The explanation of what action will be taken if lead, RDX, or TNT remained undefined in the vertical (or horizontal) direction after following the sampling process is presented in Section 5.4 - Analytic Approach. The first sentence in the second paragraph has been revised to read (added text is bolded):

*"If all data have been collected as planned (See Worksheet No. 8) and contamination has been delineated to below the MCS **in all directions**, with no significant quality deficiencies, consider the delineation of soil contamination to be complete and document this in the project report; otherwise, convene the Project Team to determine the appropriate course of action."*

Comment 8: In the first paragraph under "Analytical Tasks" on page 40, should the reference to Table 8-4 instead be Table 8-2?

Response: The third sentence in the first paragraph under "Analytical Tasks" has been corrected to reference Table 8-2.